

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
JIMMY D. STEEN,) Case No. 13-07128-MH3-7
) (Chapter 7)
 Debtor.) Judge Marian F. Harrison
)
)
MICHAEL GIGANDET, TRUSTEE,)
)
 Movant,)
)
vs.) Contested Matter
)
JIMMY D. STEEN,)
)
 Respondent.)
)
)

RESPONSE DEADLINE: March 21, 2014
HEARING DATE: April 22, 2014; 9:00 a.m.
HEARING PLACE: Courtroom Three, Customs House,
701 Broadway, Nashville, Tennessee

**OBJECTION OF DEBTOR TO TRUSTEE'S MOTION TO SELL PROPERTY,
COMBINED WITH NOTICE OF UPSET BID**

The debtor-respondent, Jimmy D. Steen (the "Debtor"), hereby objects to the "Trustee's Motion to Sell Property" filed February 28, 2014 at Document No. 17 (the "Motion"). In support of this objection, the Debtor would state as follows:

1. The Debtor respectfully contends that the proposed sale of the subject property as outlined in the Motion may not be in the best interest of the Debtor's estate and may not constitute the exercise of reasonable business judgment.
2. Specifically, the Debtor hereby offers the Trustee the sum of \$ 6,000.00 for the subject property. This amount is equal to or greater than the \$5,600.00 "Alternative Minimum Bid" as that term is defined in the Motion. As evidenced by the attached financial

account statement from American Funds, the Debtor possesses the current financial wherewithal necessary to consummate the proposed sale.

3. The Debtor reserves the right to join in any other objections filed by creditors and parties in interest in this matter.

WHEREFORE, the Debtor respectfully requests from the Court an order sustaining his objection and requests such other relief as the Court finds necessary and appropriate.

Dated: March 20, 2014.

Respectfully submitted,

/s/ Joseph P. Rusnak
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Attorneys for the Debtor

Certificate of Service

I hereby certify that a true and exact copy of the foregoing "Objection of Debtor to Trustee's Motion to Sell Property, Combined with Notice of Upset Bid" has been served upon the following counsel for parties in interest herein by delivering same to the offices of said counsel, or by mailing same to the office of said counsel by United States mail with sufficient postage thereon to carry the same to its destination:

U.S. Trustee
318 Customs House
701 Broadway
Nashville, TN 37203

Michael G. Gigandet, Trustee
208 Centre Street
Pleasant View, TN 37146

Dated: March 20, 2014.

/s/ Joseph P. Rusnak
Joseph P. Rusnak

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